

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MARIBEL MOSES, on behalf of herself and all others similarly situated,

Plaintiff,

v.

THE NEW YORK TIMES COMPANY, d/b/a
The New York Times,

Defendant.

Civil Action No.: 1:20-cv-04658-RA

Hon. Ronnie Abrams

**NOTICE OF MOTION FOR ATTORNEYS' FEES, COSTS, EXPENSES,
AND INCENTIVE AWARD**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on September 10, 2021, at 3:00 p.m. in Courtroom 1506 at the Thurgood Marshall United States Courthouse, before the Honorable Ronnie Abrams, United States District Judge for the Southern District of New York, 40 Foley Square, New York, New York, Plaintiff Maribel Moses (“Plaintiff”), by and through Class Counsel, will move and hereby does move for an order: (1) approving the payment of attorneys’ fees, costs, and expenses in the amount of \$1,250,000, equal to 22.5% of the settlement fund; (2) granting Plaintiff an incentive award of \$5,000 in recognition of her efforts on behalf of the Settlement Class; and (3) awarding such other and further relief as the Court deems reasonable and just.

PLEASE TAKE FURTHER NOTICE that, in support of the motion, Plaintiff will rely upon: (1) the accompanying memorandum of law in support; (2) the Declaration of Maribel Moses; and (3) the Declaration of Frederick J. Klorczyk III (the “Klorczyk Decl.”), and the exhibits attached thereto.

Dated: July 1, 2021

Respectfully submitted,

BURSOR & FISHER, P.A.

By: /s/ Frederick J. Klorczyk III
Frederick J. Klorczyk III

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